

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

SUSAN MARPLE, individually and as a)
purported class representative, and)
STEPHANIE WORRELL, individually and)
as a purported class representative,)
vs.)
T-MOBILE CENTRAL LLC,)
Defendant.) Case No. 4:10-cv-00954-NKL
Plaintiffs,) 10-00955-CV-W-NKL
vs.) 10-00956-CV-W-NKL
T-MOBILE CENTRAL LLC,) 10-00957-CV-W-NKL
Defendant.) 10-00958-CV-W-NKL
vs.) 10-00959-CV-W-NKL
T-MOBILE CENTRAL LLC,) 10-00960-CV-W-NKL
Defendant.) 10-00961-CV-W-NKL
vs.) 10-00962-CV-W-NKL
T-MOBILE CENTRAL LLC,) 10-00963-CV-W-NKL

**DEFENDANT T-MOBILE CENTRAL LLC'S UNOPPOSED MOTION FOR
EXTENSION OF TIME IN WHICH TO REPLY TO PLAINTIFFS' SUGGESTIONS IN
OPPOSITION TO T-MOBILE'S MOTION TO COMPEL ARBITRATION OR, IN THE
ALTERNATIVE, FOR A STAY OF PROCEEDINGS PENDING THE UNITED STATES
SUPREME COURT'S DECISION IN *AT&T MOBILITY V. CONCEPCION***

COMES NOW Defendant T-Mobile Central LLC ("T-Mobile"), and moves the Court for an Order extending the time in which to reply to Plaintiffs' Suggestions in Opposition to T-Mobile's Motion to Compel Arbitration or, in the Alternative, for a Stay of Proceedings Pending the United States Supreme Court's Decision in *AT&T Mobility v. Concepcion* (hereinafter "Motion to Compel") up to, and including, February 11, 2011. In support of this Motion, T-Mobile states as follows:

1. The current deadline for filing a reply to Plaintiffs' Suggestions in Opposition to Defendant's Motion to Compel is February 4, 2011.
2. T-Mobile has not sought any prior extension of time for this deadline.

3. T-Mobile has conferred in good faith with Plaintiffs' counsel, Kirk T. May, concerning the requested extension and Mr. May is agreeable to the requested extension.

4. The requested extension of time will not affect any deadline.

WHEREFORE, Defendant T-Mobile respectfully moves this Court for an extension of time, up to and including February 11, 2011, in which to reply to Plaintiffs' Suggestions in Opposition to Defendant's Motion to Compel.

Dated: January 24, 2011, 2010

Respectfully submitted,

BRYAN CAVE LLP

s/ James D. Lawrence

James D. Lawrence MO # 53411
1200 Main Street, Suite 3500
Kansas City, MO 64105-2100
Tel: (816) 374-3200
Fax: (816) 374-3300
jdlawrence@bryancave.com

Mark Leadlove MO # 33205
211 North Broadway, Suite 3600
St. Louis, MO 63102-2750
Tel: (314) 259-2000
Fax: (314) 259-2020
mleadlove@bryancave.com

-and-

PROSKAUER ROSE LLP

Bradley I. Ruskin
Michael M. Mervis
1585 Broadway
New York, NY 10036-8299
Tel: (212) 969-3000
Fax: (212) 969-2900
ATTORNEYS FOR T-MOBILE
CENTRAL LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above and foregoing was electronically filed on this 24th day of January, 2011, with the Clerk of the Court via the CM/ECF system which automatically transmits a Notice of Electronic Filing to counsel of record for Plaintiffs' Kirk T. May, Defendant T-Mobile Central LLC.

s/ James D. Lawrence

Attorney for Defendant
T-Mobile Central LLC